

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SRI INTERNATIONAL, INC.,
a California Corporation,

Plaintiff and
Counterclaim-Defendant,

v.

INTERNET SECURITY SYSTEMS, INC.,
a Delaware corporation,
INTERNET SECURITY SYSTEMS, INC.,
a Georgia Corporation, and
SYMANTEC CORPORATION,
a Delaware corporation,

Defendants and
Counterclaim- Plaintiffs.

Civil Action No. 04-CV-1199 (SLR)

**DECLARATION OF PAUL S. GREWAL IN SUPPORT OF
SYMANTEC CORPORATION'S OPPOSITION TO
SRI INTERNATIONAL, INC.'S MOTION TO EXCLUDE
FROM EVIDENCE THE EXPERT OPINION OF DANIEL TEAL
VOLUME 1 OF 4**

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Dated: June 30, 2006

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SRI INTERNATIONAL, INC., a California
Corporation,

Plaintiff and
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v.

INTERNET SECURITY SYSTEMS, INC., a
Delaware corporation, INTERNET
SECURITY SYSTEMS, INC., a Georgia
Corporation, and SYMANTEC
CORPORATION, a Delaware corporation,

Defendants and
Counterclaim- Plaintiffs.

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**DECLARATION OF PAUL S. GREWAL IN SUPPORT OF SYMANTEC
CORPORATION'S OPPOSITION TO SRI INTERNATIONAL, INC.'S MOTION
TO EXCLUDE FROM EVIDENCE THE EXPERT OPINION OF DANIEL TEAL**

I, Paul S. Grewal, declare that:

1. I am a member of the law firm of Day Casebeer Madrid & Batchelder LLP, counsel for Defendant Symantec Corporation. I am admitted to practice law before all of the courts of the State of California.
2. I make this declaration of my own personal knowledge. If called to testify as to the truth of the matters stated herein, I could and would do so competently.
3. On June 29, 2006, I caused to be searched SRI's production of documents to Symantec for all unique documents referencing Daniel M. Teal. The search identified 63 unique documents.
4. On June 29, 2006, I caused to be searched Symantec's production of documents to SRI for all unique documents referencing Daniel M. Teal. The search identified 71 unique documents.

5. Attached hereto as Exhibit A is a true and correct copy of the Expert Report of Daniel Teal including exhibits.
6. Attached hereto as Exhibit B is a true and correct copy of a document regarding DIDS (Distributed Intrusion Detection System) – Motivation, Architecture, and an Early Prototype bearing BATES Production Nos.: DD_0000018-0000034.
7. Attached hereto as Exhibit C is a true and correct copy of Bob Gleichauf and Dan Teal, WheelGroup Corporation, NetRanger High-Level Overview Version 1.1 bearing BATES Production Nos.: SYM_P_0531123-0531139
8. Attached hereto as Exhibit D is a true and correct copy of a February 14, 2006 Letter from J. Loeb to K. Prescott re: Symantec's Rule 26(e) Supplementations.
9. Attached hereto as Exhibit E is a true and correct copy of a May 16, 2006 Letter from R. Dubord Brown to M. Rosen re: Subpoena of Daniel Teal.
10. Attached hereto as Exhibit F is a true and correct copy of the May 12, 2006 Subpoena of Daniel Teal.
11. Attached hereto as Exhibit G is a true and correct copy of a May 19, 2006 Letter from P. Grewal to M. Rosen re: production of responsive documents to the Daniel Teal Subpoena.
12. Attached hereto as Exhibit H is a true and correct copy of selected transcript pages from the May 24, 2006 deposition of Daniel Teal.
13. Attached hereto as Exhibit I is a true and correct copy of the Court's June 30, 2005 Scheduling Order.
14. Attached hereto as Exhibit J is a true and correct copy of a September 20, 2005 Letter from J. Loeb to G. Steele re: List of Custodians.
15. Attached hereto as Exhibit K is a true and correct copy of a November 30,

2005 Letter from J. Loeb to K. Prescott re: Additional Custodians.

16. Attached hereto as Exhibit L is a true and correct copy of NetRanger Real-Time Network Intrusion and Detection Performance and Security Test, dated April 30, 1997 bearing BATES Production Nos.: SYM_P_0074255-0074481.

17. Attached hereto as Exhibit M is a true and correct copy of a Presentation entitled WheelGroup Corporation – NetRanger Installation & Configuration Training bearing BATES Production Nos.: SYM_P_0077338-0077416.

18. Attached hereto as Exhibit N is a true and correct copy of SQL Database Queries bearing BATES Production Nos.: SYM_P_0074926-0074947.

19. Attached hereto as Exhibit O is a true and correct copy of NetRanger User's Guide, dated November 20, 1996 bearing BATES Production Nos.: SYM_P_0526566-0526735.

20. Attached hereto as Exhibit P is a true and correct copy of NetRanger Network Security Management System User's Guide Version 1.2.2 bearing BATES Production Nos.: SYM_P_0075283-0075535.

21. Attached hereto as Exhibit Q is a true and correct copy of NetRanger User's Guide Version 1.2 bearing BATES Production Nos.: SYM_P_0071736-0071953.

22. Attached hereto as Exhibit R is a true and correct copy of NetRanger Network Security Management System User's Guide Version 1.3.1 bearing BATES Production Nos.: SYM_P_0074948-0075282.

23. Attached hereto as Exhibit S are true and correct copies of Articles and Press Releases bearing Bates Production Nos.: SYM_P_0078627-0078630; SYM_P_0077928-0077931; SYM_P_0074722-0074723 ; SYM_P_0074647-0074648; SYM_P_0074525-0074526.

24. Attached hereto as Exhibit T are true and correct copies of WheelGroup Press Releases bearing BATES Production Nos.: ISS_02126304-02126307; ISS_02126320-02126327; ISS_02126355-02126367; ISS_02126350-02126354.

25. Attached hereto as Exhibit U is a true and correct copy of Alfonso Valdes and Debra Anderson, Statistical Methods for Computing Usage Anomaly Detection Using NIDES (Next-Generation Intrusion Detection Expert System), dated January 27, 1995 bearing BATES Production Nos.: SYM_P_0068936-0068942.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Signed on June 30, 2006.

Paul S. Grewal

Paul S. Grewal